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**THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON.
AT TACOMA.**

FREDERICK O. SILVER.
Plaintiff,

vs.

TRANSWORLD SYSTEMS INC., FRED
EBRAHEMI, JOSEPH E. LAUGHLIN,
MICHAEL M. PATRIARCA, JOEL
PETERSEN
Defendant's.

CASE NO. 2:25-cv-01024 KKE

JURY TRIAL DEMANDED.

**PLAINTIFF'S COMPLAINT FOR VIOLATIONS OF THE FAIR CREDIT REPORTING
ACT AND FAIR DEBT COLLECTION PRACTICES ACT.**

Frederick O. Silver (hereinafter "Plaintiff"), sues defendant's, TRANSWORLD SYSTEMS INC; FRED EBRAHEMI, JOSEPH E. LAUGHLIN, MICHAEL M. PATRIARCA, JOEL PETERSEN, This is an action for Actual and Statutory Damages, seeking Monetary Relief, declaratory relief, and injunctive relief brought by Plaintiff, Frederick O. Silver, against Defendant's, Transworld Systems Inc., for violations of the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692 et seq. The Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq, (the "FCRA") and other Claims related to unlawful credit reporting practices.

The FDCPA was enacted to eliminate abusive debt collection practices and to ensure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged.

Plaintiff hereby alleges upon personal knowledge and belief as to his own acts, and upon

information and belief based on investigation by Plaintiff as to all other matters, as to which allegations Plaintiff believe substantial evidentiary support exists or will exist after a reasonable opportunity for further investigation and discovery of evidence, as follows:

THE PARTIES.

1. Frederick O. Silver, hereinafter "Plaintiff" is an adult Natural Person, a resident of Pierce County, Washington State Plaintiff is a "consumer" as defined by 15 U.S.C. § 1681a(c) of the FCRA.
2. Defendant, Transworld Systems Inc., is a debt collector as defined by 15 U.S.C. § 1692a(6), and regularly collects debts owed to others using the mails and telephone and operates from its principal place of business at **33400 8th Ave S, Federal Way, WA 98003.**
3. Defendant, Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen, are debt collectors as defined by 15 U.S.C. § 1692a(6), and regularly collects debts owed to others using the United States postal mails and telephone
4. Defendant, Transworld Systems Inc., can be served with process of Service by ***Severing:***
Registered Agent Name: CORPORATION SERVICE COMPANY, ***Street Address:*** 300 DESCHUTES WAY SW STE 208 MC-CSC1, TUMWATER, WA, 98501, UNITED STATES
5. Defendant, Transworld Systems Inc., can be served with process of Service by ***Severing:***
Registered Agent Name: Transworld Systems Inc.
Street Address: 33400 8th Ave S, Federal Way, WA 98003, United States
6. At all relevant times, defendant's Transworld Systems Inc., Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen, acted through its duly Authorized Agents, President, Vice President, Employees, Officers, Members, Directors, Heirs, Successors,

Assigns, Secretary, Principals, Trustees, Sureties, Subrogates, Representatives, and Insurers.

JURISDICTION AND VENUE.

7. This Court has Jurisdiction over the claims in this action pursuant to 28 U.S.C. § 1331 because the claims arise under federal law, specifically the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692 et seq. The Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq, (the “FCRA”).

8. Venue is proper in this district under 28 U.S.C. § 1391 because the Plaintiff resides in Pierce County, Washington and Transworld Systems Inc; conducts business in the State of Washington, including in this District, Personal Jurisdiction over defendants is Established.

FAIR DEBT COLLECTION PRACTICES ACT (FDCPA), 15 U.S.C. § 1692 ET SEQ.

THE FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. § 1681 ET SEQ, (THE “FCRA”).

9. This Civil Action is brought under Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692 et seq. The Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 et seq, (the “FCRA”), is U.S. Federal Government legislation enacted to promote the accuracy, fairness, and privacy of consumer information contained in the files of consumer reporting agencies.

GENERAL FACTUAL ALLEGATIONS.

10. Transworld Systems Inc; is reporting a debt allegedly owed by Plaintiff on Plaintiff's on The three major consumer credit reporting agencies are Equifax, Experian, and TransUnion.

11. Plaintiff mailed a written request to Transworld Systems Inc; pursuant to 15 U.S.C. § 1692g(b), disputing the debt and requesting validation.

12. Transworld Systems Inc; received the request but failed to cease collection activities and did not provide the requested validation of the debt.

1 13. Despite failing to validate the debt, Transworld Systems Inc; continued to report the debt to
2 The three major consumer credit reporting agencies are Equifax, Experian, and TransUnion,
3 thereby harming Plaintiff's creditworthiness.

4 14. Plaintiff alleged Account numbers **264553xx** with Transworld Systems Inc; was said to have
5 been opened around **March 26th 2025**

6 15. Transworld Systems Inc; conduct has caused Plaintiff to suffer actual damages, including but
7 not limited to credit denials, emotional distress, and reputational harm.

8 16. Plaintiff sent a proper dispute and debt validation request to TSI pursuant to 15 U.S.C. §
9 1692g and § 1681i.

10 17. Despite receiving notice of the dispute, Transworld Systems Inc; failed to conduct a
11 reasonable investigation and continued to furnish inaccurate information to credit reporting
12 agencies, in violation of its duties under 15 U.S.C. § 1681s-2(b).

13 18. Transworld Systems Inc;, Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel
14 Petersen never communicated with Plaintiff to resolve the dispute or validate the debt as
15 required by law.

16 19. As a result of Transworld Systems Inc;, Fred Ebrahemi, Joseph E. Laughlin, Michael M.
17 Patriarca, Joel Petersen conduct, Plaintiff suffered harm including damage to his credit, loss of
18 credit opportunities, and emotional distress.

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22 **COUNT I / CLAIMS FOR RELIEF**

23 20. Plaintiff repeats, realleges, and incorporates the averments contained in all the above
24 paragraphs of his Complaint and Claims as though fully set forth herein.

25 21. At all times pertinent hereto, Transworld Systems Inc;, Fred Ebrahemi, Joseph E. Laughlin,
26 Michael M. Patriarca, Joel Petersen, is liable under 15 U.S.C. §§ 1681n and 1681o for
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1 willfully and negligently:.

2 a. Failing to properly and timely delete inaccurate information from Plaintiff's credit files; and

3 b. Continuing to furnish and disseminate inaccurate information and derogatory negative
4 reporting despite having knowledge of its inaccuracy.
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6 22. Transworld Systems Inc., Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel
7 Petersen, failed to comply with 15 U.S.C. § 1681s-2(b) by failing to conduct a reasonable
8 investigation after notice of the dispute.

9 23. Pursuant to 15U.S.C. §1681n and 15 U.S.C. §1681o, Transworld Systems Inc., Fred
10 Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen,;

11 24. Willfully and negligently failing to properly and timely delete the inaccurate information from
12 the Plaintiff's credit files despite being provided with proof of its inaccuracy; and

13 25. Willfully and negligently continuing to furnish and disseminate inaccurate information and
14 derogatory credit account ending in 9108 and other information despite having knowledge of
15 its inaccuracy; and
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17 26. Willfully and negligently failing to comply with the requirements imposed on furnishers of
18 information pursuant to 15 U.S.C §1681s-2(b); and
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20 27. Reporting information with actual knowledge of errors in violation of 15 U.S.C. §1681s-
21 2(a)(1)(A); and

22 28. Reporting information after notice and confirmation of errors in violation of 15 U.S.C.
23 §1681s-2(a)(1)(B); and
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25 29. Failing to correct and update information in violation of 15 U.S.C. §1681s-2(a)(2)(B); and

26 30. Failing to provide notice of dispute in violation of 15 U.S.C. §1681s- 2(a)(3); and

27 31. Failing to investigate with respect to disputed information in violation of §1681s-2(a)(8).
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32. Transworld Systems Inc., Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen, further violated 15 U.S.C. § 1681s-2(a) by reporting information with actual knowledge or reasonable cause to believe the information was inaccurate.

COUNT TWO: VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES

ACT (FDCPA)

33. Plaintiff re-alleges and incorporates by reference the preceding paragraphs.

34. Transworld Systems Inc., Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen, is a "debt collector" under the FDCPA.

35. Transworld Systems Inc., Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen, violated multiple provisions of the FDCPA, including but not limited to:

- a. Failing to cease collection of the debt after Plaintiff disputed it (15 U.S.C. § 1692g(b));
- b. Using false, deceptive, or misleading representations in connection with the collection of the debt (15 U.S.C. § 1692e);
- c. Engaging in unfair or unconscionable means to collect the debt (15 U.S.C. § 1692f).

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Enter judgment in favor of Plaintiff and against Def Transworld Systems Inc., Fred Ebrahemi, Joseph E. Laughlin, Michael M. Patriarca, Joel Petersen;
- B. Award actual damages pursuant to 15 U.S.C. § 1681o and § 1692k;
- C. Award statutory damages pursuant to 15 U.S.C. § 1681n and § 1692k;
- D. Award punitive damages pursuant to 15 U.S.C. § 1681n(a)(2);
- E. Award costs and reasonable attorney's fees (if applicable);
- F. Grant such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL.

Plaintiff hereby request a Trial by Jury on all issues raise in this Complaint and Claims pursuant to Rule 38 of the Federal Rules of Civil Procedure and Section 102 of the Civil Rights Act of 1991, 42 U.S.C § 1981a.

Plaintiffs' investigation of the matters alleged herein is ongoing. Pursuant to such investigation and as allowed by the Court, Plaintiffs expressly reserve the right to amend or supplement the claims herein in accordance with Fed.R.Civ.P. 15.

Dated: this 24th Day of May 2025.



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